

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

EX PARTE APPLICATION OF
KUWAIT PORTS AUTHORITY FOR AN
ORDER TO OBTAIN DISCOVERY FOR
USE IN FOREIGN PROCEEDINGS
PURSUANT TO 28 U.S.C. §1782

Case No. _____

**EX PARTE APPLICATION OF THE KUWAIT PORTS AUTHORITY FOR AN
ORDER TO CONDUCT DISCOVERY FOR USE IN FOREIGN PROCEEDINGS
PURSUANT TO 28 U.S.C. § 1782**

The Kuwait Ports Authority ("KPA"), pursuant to 28 U.S.C. § 1782 and Federal Rules of Civil Procedure 26, 34, and 45, respectfully requests that this court grant an *ex parte* order in the form attached as Exhibit 3 to the Declaration of Jonathan C. Cross ("Cross Declaration") authorizing KPA to obtain certain limited discovery for use in a contemplated litigation in the Cayman Islands.¹ In support of this Application, KPA submits a Memorandum of Law, and attaches the sworn declarations with accompanying exhibits of (1) Jonathan C. Cross; (2) Jennifer Fox; and (3) Yousef Al Sabah.

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¹ See Cross Declaration, Exhibits 1-2.

Dated: January 27, 2020

Respectfully submitted,

/s/ Joseph G. Falcone

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